

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
KEITH JACOBS,	:	VIOLATIONS:
a/k/a "Leonard Miller,"	:	18 U.S.C. § 1951(a) (conspiracy to
a/k/a "Juicy,"	:	commit Hobbs Act robbery – 1 count)
RAHEEM BROOKS	:	18 U.S.C. § 1951(a) (interference with
	:	interstate commerce by robbery – 3
	:	counts)
	:	18 U.S.C. § 924(c)(1) (using and carrying
	:	a firearm during and in relation to a
	:	crime of violence – 3 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

S U P E R S E D I N G I N D I C T M E N T

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. Oxford Circle Pharmacy, located at 1501 East Cheltenham Avenue in Philadelphia, Pennsylvania, was a business engaged in commercial activities within the Eastern District of Pennsylvania and elsewhere, that is, receiving products for its business, which affected interstate commerce.

2. On or about January 15, 2009, in Philadelphia, the Eastern District of Pennsylvania, defendants

**KEITH JACOBS,
a/k/a "Leonard Miller,"
a/k/a "Juicy," and
RAHEEM BROOKS**

knowingly and intentionally conspired and agreed, together and with each other to commit

robbery, which robbery would unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, in violation of Title 18, United States Code, Section 1951(a), that is, the armed robbery of the Oxford Circle Pharmacy, located at 1501 East Cheltenham Avenue, in Philadelphia, Pennsylvania.

MANNER AND MEANS

_____3. It was part of the conspiracy that defendants KEITH JACOBS and RAHEEM BROOKS committed an armed robbery of the Oxford Circle Pharmacy, located at 1501 East Cheltenham Avenue in Philadelphia, Pennsylvania, and stole drugs and money.

OVERT ACTS

In furtherance of the conspiracy and to effect the object of the conspiracy, defendants KEITH JACOBS and RAHEEM BROOKS committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

On or about January 15, 2009:

1. Defendants KEITH JACOBS and RAHEEM BROOKS entered the Oxford Circle Pharmacy, located at 1501 East Cheltenham Avenue in Philadelphia, Pennsylvania.
2. Defendant KEITH JACOBS approached the counter and asked if the pharmacy had Xanax and Oxycontin, which are controlled substances, while defendant RAHEEM BROOKS positioned himself by the front door and locked the door.
3. When defendant KEITH JACOBS produced a semi-automatic handgun and announced a robbery, defendant RAHEEM BROOKS prevented customers from leaving and acted as the look-out at the front door.

4. Defendant KEITH JACOBS stole money from the register and demanded additional money from an employee and the pharmacist behind the counter when the register did not yield enough cash, stealing cash totaling approximately \$870.

5. After defendant KEITH JACOBS filled a backpack with drugs stolen from the pharmacy employees, defendants JACOBS and BROOKS were about to flee from the pharmacy's front door, when they realized that Philadelphia Police officers were outside the pharmacy.

6. Defendants KEITH JACOBS and RAHEEM BROOKS unsuccessfully attempted to flee from the store through another exit.

7. Defendant KEITH JACOBS required a pharmacy employee to open the back/side door of the pharmacy so that defendants JACOBS and RAHEEM BROOKS could escape. Defendant JACOBS continued to brandish a firearm when the door was opened. Defendant JACOBS then failed to comply with a police order to drop the gun and was shot at by the police. However, one of the shots hit the pharmacy employee instead.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this superseding indictment:

1. Paragraph 1 of Count One of this indictment is incorporated here.
2. On or about January 15, 2009, in Philadelphia, the Eastern District of

Pennsylvania, defendants

**KEITH JACOBS,
a/k/a “Leonard Miller,”
a/k/a “Juicy,” and
RAHEEM BROOKS**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendants unlawfully took and obtained, and attempted to take and obtain, and aided and abetted the unlawful taking and obtaining of, money and drugs belonging to Oxford Circle, in the presence of employees of that business, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to their person and property, that is, by forcing employees to turn over money and drugs at gunpoint and by forcing employees and customers to the floor at gunpoint.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 15, 2009, in Philadelphia, the Eastern District of
Pennsylvania, defendants

**KEITH JACOBS,
a/k/a “Leonard Miller,”
a/k/a “Juicy,” and
RAHEEM BROOKS**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a semi-automatic pistol, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to commit interference with interstate commerce by robbery and interference with interstate commerce by robbery, in violation of Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this superseding indictment:

1. Ring's Drug, located at 5814 Rising Sun Avenue in Philadelphia, Pennsylvania, was a business engaged in commercial activities within the Eastern District of Pennsylvania and elsewhere, that is, receiving products for its business, which affected interstate commerce.

2. On or about January 14, 2009, in Philadelphia, the Eastern District of Pennsylvania, defendant

**KEITH JACOBS,
a/k/a "Leonard Miller,"
a/k/a "Juicy,"**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, the defendant unlawfully took and obtained, and attempted to take and obtain, money and drugs belonging to Ring's Drug, in the presence of employees of that business, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to their person and property, that is, by forcing employees to turn over money and drugs at gunpoint and by forcing employees and customers to the floor at gunpoint.

In violation of Title 18, United States Code, Section 1951(a).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 14, 2009, in Philadelphia, the Eastern District of Pennsylvania, defendant

**KEITH JACOBS,
a/k/a “Leonard Miller,”
a/k/a “Juicy,”**

knowingly used and carried a firearm, that is, a semi-automatic pistol, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with interstate commerce by robbery, in violation of Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this superseding indictment:

1. Lee's Grocery, located at 5300 Akron Street in Philadelphia, Pennsylvania, was a business engaged in commercial activities within the Eastern District of Pennsylvania and elsewhere, that is, receiving products for its business, which affected interstate commerce.

2. On or about January 14, 2009, in Philadelphia, the Eastern District of Pennsylvania, defendant

**KEITH JACOBS,
a/k/a "Leonard Miller,"
a/k/a "Juicy,"**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, the defendant unlawfully took and obtained, and attempted to take and obtain, money belonging to Lee's Grocery, in the presence of employees of that business, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to their person and property, that is, by forcing employees to move to the back of the store and going into the register to take money at gunpoint.

In violation of Title 18, United States Code, Section 1951(a).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 14, 2009, in Philadelphia, the Eastern District of Pennsylvania, defendant

**KEITH JACOBS,
a/k/a “Leonard Miller,”
a/k/a “Juicy,”**

knowingly used and carried a firearm, that is, a semi-automatic pistol, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with interstate commerce by robbery in violation of Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Section 924(c)(1).

A TRUE BILL:

FOREPERSON

**LAURIE MAGID
United States Attorney**